

REMARKS/ARGUMENTS

The final office action of June 19, 2003 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1, 3-9 and 11-28 remain in this application.

Preliminarily, applicants would like to thank the Examiner and her supervisor for the courtesies extended to the undersigned during the personal interview of October 16, 2003. During the interview it was agreed that the Examiner would reconsider the rejections in light of applicants' comments concerning the remaining rejections.

Claims 1, 3-9 and 11-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent no. 5,956,034 to Sachs et al. ("Sachs '034") in view of U.S. publication no. 2003/0079179 to Brown et al. ("Brown") and claims 18, 21, 24 and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over this combination and further in view of U.S. patent no. 6,493,734 to Sachs et al. ("Sachs '734"). Applicants respectfully traverse this rejection.

The action alleges that Sachs '034 describes all the features of independent claims 1 and 9, but for providing the user access to the enhanced functionality in response to the user selecting the element of the immersive reading page, wherein *no visual indication of the enhanced functionality is provided prior to the user selecting the element of the immersive reading page*. To access a function in Sachs '034, the user must select an icon providing a visual indication of the function. To overcome this deficiency, the action relies on Brown. In particular, the action alleges that Fig. 10, and paragraphs [0045] and [0049] of suggest that Brown does not provide visual indication of the enhanced functionality prior to the user selecting the element of the immersive reading page as recited in claims 1 and 9.

During the interview, the Examiner explained that the drop down menu feature selected from the tool bar in Fig. 10 showed this feature. Applicants have defined the term "element" with the combination of the disclosure at page 3, line 14 to page 4, line 5 and page 13, lines 6-16. "Element " means a word, symbol or picture on the display that forms part of an immersive reading page and may also refer to areas associated with or in the immediate vicinity of the word, symbol or picture. As explained by applicants' representative during the interview, a selection from the toolbar does not teach, show or otherwise suggest the selection of an element of an

immersive reading page. Indeed, the toolbar of Brown is not an element on the immersive reading page. Moreover, if a drop down menu were to appear when one of the icons of Sachs '034 was selected the icon would still provide a visual indication of the enhanced functionality prior to the user selecting the element of the immersive reading page. Therefore, the combination of Sachs '034 and Brown, even if proper, does not teach or suggest providing the user access to the enhanced functionality in response to the user selecting the element of the immersive reading page, wherein *no visual indication of the enhanced functionality is provided prior to the user selecting the element of the immersive reading page* as recited in claims 1 and 9. For at least this reason, claims 1 and 9 are patentably distinct from the combination of Sachs '034 patent and Brown.

Claims 3-8 and 11-28, which ultimately depend from one of claims 1 and 9, are patentable over the applied art for the same reasons as their base claim, and further in view of the novel features recited therein. For example, claims 4 and 12 each call for the step of invoking a training mode for teaching the association to a user. To show this feature, the action points to fig. 2, element 86a (program instructions) and col. 4, ll. 35-55. However, at most, these portions of the Sachs '034 mention in passing "program instructions". Notably, these portions of Sachs '034 are wholly devoid of any teaching or suggestions of invoking a training mode for teaching the association (between element of the immersive reading page and enhanced functionality) to a user.

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CONCLUSION

If any additional fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same.

Respectfully submitted,

BANNER & WITCOFF, LTD.

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By:



Gary D. Fedorochko
Registration No. 35,509

1001 G Street, N.W.
Washington, D.C. 20001-4597
Tel: (202) 824-3000
Fax: (202) 824-3001
GDF:lab